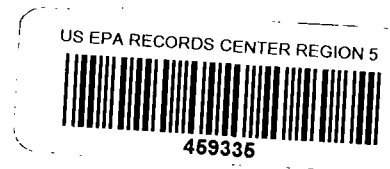


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M E M O R A N D U M

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

HSE-5J

DATE: 26 August 1993

SUBJECT: Hoffman Landfill/Associated Asphalt Site

FROM: Paul R. Steadman, OSC, RS-III

TO: Mary Elaine Gustafson, Acting Chief, RS-III

On Wednesday, August 25, 1993, a removal site assessment (SA) of the subject facility in Rock Falls, Illinois was conducted. The SA was done in concert with ARCS personnel authorized by the Site Assessment Section to do a Site Screening Inspection. ARCS representative John Noyes of Black and Veatch Waste Science and Technology (BVWST) identified areas at the subject site that he was not prepared to address because of apparent hazardous materials storage and their potential release within the site.

The conduct of the SA was done with the assistance of TAT personnel Raghu Nagam, Evette Anderson and John Sherrard. We also contacted PRPs Henry Hoffman and Brad Bruns and requested their presence at the site. They were to assist us in determining which materials were in use at the site for tar and asphalt manufacture and which were discards and in violation of CERCLA or RCRA TSD requirements.

Based on an in depth and thorough inspection of the site and all facilities, this site is nominally in violation of Superfund standards. This determination is based on the presence of seven (7) 55 gallon capacity drums which wholly contain product or which are partially full, and one tank (approx. cap. 10,000 gallons) which contains some substance, possibly water and waste "tar binder", occupying approximately 1/16th of the total tank capacity. The remaining six tanks and 31 drums, three of 30 gallon capacity and 29 of 55 gallon capacity, are all empty or, in the case of six drums, contain an off specification "tar binding" product which is to be returned to the manufacturer.

The decision was made not to derive any samples for analysis based on no odor and the water-like appearance of the product within the drums, inaccessibility of sample ports in two drums, and negative readings from the HNu and CGI instrumentation.

I was able to get a firm commitment and agreement from Mr. Brad Bruns whom I'll identify as a secondary PRP due to his knowledge of the status of the site's contaminants, to reorganize the staging

area of the useable (RCRA-U listed) materials at this site and to have his company's liquid waste recycler and fuel blender contractor remove the contents of the seven drums and one tank within ten (10) days.

We will require verification that this removal has been undertaken in an environmentally suitable manner. A letter to Mr. Bruns and Mr. Hoffman is being prepared to document this agreement as well.